

MORGAN, LEWIS & BOCKIUS LLP
(Pennsylvania Limited Liability Partnership)
502 Carnegie Center
Princeton, New Jersey 08540-7814
Terry D. Johnson
Ashley D. Chilton
(609) 919-6657

Attorneys for Defendant JPMorgan Chase Bank, N.A.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JONATHAN GOICOECHEA,

Plaintiff,

v.

JPMORGAN CHASE & CO.; and, JOHN
DOES 1-5 AND 6-10,

Defendants.

Civil Action No.: 3:23-cv-03900-RK-DEA

**NOTICE OF DEFENDANT JPMORGAN
CHASE BANK, N.A.'S MOTION TO
DISMISS PLAINTIFF'S COMPLAINT**

Motion Returnable: September 5, 2023

PLEASE TAKE NOTICE that on September 5, 2023, or as soon thereafter as it may be heard, Defendant JPMorgan Chase Bank, N.A. (incorrectly identified in the Complaint as "JP Morgan Chase & Co.") ("Defendant"), will move to dismiss Plaintiff's Complaint under Federal Rule of Civil Procedure 12(b)(6).

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, Defendant will rely upon the accompanying Brief. Defendant also submits for the Court's consideration a Proposed Order.

Respectfully submitted,

Dated: August 11, 2023

MORGAN, LEWIS & BOCKIUS LLP

s/ Terry D. Johnson

Terry D. Johnson

Ashley D. Chilton

502 Carnegie Center

Princeton, New Jersey 08540

Telephone: (609) 919-6669

Facsimile: (609) 919-6701

terry.johnson@morganlewis.com

ashley.chilton@morganlewis.com

*Attorneys for Defendant JPMorgan Chase Bank,
N.A.*

CERTIFICATE OF SERVICE

I hereby certify that on this date the foregoing Notice of Motion and accompanying Brief and Proposed Order were served on all counsel of record via ECF.

Dated: August 11, 2023

/s/ Terry D. Johnson
Terry D. Johnson